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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 IN RE: CATHODE RAY TUBE (CRT)
17 ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

18 This Document Relates to:

19 *ALL INDIRECT PURCHASER ACTIONS*
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**DECLARATION OF WYATT M. CARLOCK
IN SUPPORT OF IRICO DEFENDANTS'
MOTION IN LIMINE #2 TO PRECLUDE
PLAINTIFFS FROM REFERRING TO NON-
CRT PRODUCTS AND SALES OF THOSE
PRODUCTS AS REFLECTING SALES OF
CRTS BY AN IRICO ENTITY**

Judge: Honorable Jon S. Tigar

1 I, Wyatt M. Carlock, declare as follows:

2 1. I am a member of the bar of the District of Columbia and admitted to practice before
3 this Court *pro hac vice*. I am an attorney with Baker Botts L.L.P., which represents Defendants
4 Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display,”
5 collectively, “Irico” or the “Irico Defendants”) in this action. I make this Declaration in support of
6 Irico Defendants’ Motion in Limine #2 to Preclude Parties from Referring to non-CRT Products
7 and Sales of those Products as Reflecting Sales of CRTs by an Irico Entity. If called as a witness, I
8 could and would testify to the matters set forth in this declaration of my own personal knowledge.

9 2. Attached hereto as Exhibit 1 is a true and correct copy of Indirect Purchaser
10 Plaintiffs’ Supplemental Objections and Responses to the Irico Defendants’ Second Set of
11 Interrogatories, dated September 1, 2022.

12 3. Attached hereto as Exhibit 2 is a true and correct copy of a certified translation of a
13 document produced by Irico in this litigation, cited in IPPs’ Supplemental Objections and
14 Responses to the Irico Defendants’ Second Set of Interrogatories, and bearing the Bates label IRI-
15 CRT-00025698 ranging to IRI-CRT-00035759.

16 4. Attached hereto as Exhibit 3 is a true and correct copy of a certified translation of a
17 document produced natively by Irico in this litigation, cited in IPPs’ Supplemental Objections and
18 Responses to the Irico Defendants’ Second Set of Interrogatories, and bearing the Bates label IRI-
19 CRT-00000836.

20 5. Attached hereto as Exhibit 4 is a true and correct copy of a certified translation of a
21 document produced natively by Irico in this litigation, cited in IPPs’ Supplemental Objections and
22 Responses to the Irico Defendants’ Second Set of Interrogatories, and bearing the Bates label IRI-
23 CRT-00000837.

24 6. Attached hereto as Exhibit 5 is a true and correct copy of a certified translation of a
25 document produced natively by Irico in this litigation, cited in IPPs’ Supplemental Objections and
26 Responses to the Irico Defendants’ Second Set of Interrogatories, and bearing the Bates label IRI-
27 CRT-00000838.

